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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 RASHAUD BLANDBERG, an Individual,
10
11 Plaintiff,

12 vs.

13 ADVANCED LIGHTING AND
14 ELECTRIC, INC., DOES I -X; ROE
15 CORPORATIONS I -X.
16 Defendant.

CASE NO.: 2:19-cv-01519-RFB-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF DISCOVERY
SCHEDULE**

(SECOND REQUEST)

17 The parties, Plaintiff RASHAUD BLANDBURG (“Blandburg”) and Defendant
18 ADVANCED LIGHTING AND ELECTRIC, INC. (“Advanced Lighting”), by and through
19 their respective attorneys of record, hereby stipulate and agree as follows:
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21 This is the parties’ second request for an extension for the discovery schedule. The
22 requested extension is warranted under the current circumstances and will not result in undue
23 delay in the administration of this cause.
24

25 For the reasons stated herein, that the following deadlines be extended:

26 ▪ The close of Discovery currently set for September 18, 2020, be extended by
27 approximately 90 days, such that the new close of discovery shall be **December 17, 2020**;
28

1 ▪ The deadline to file dispositive motions, which is currently October 19, 2020,
2 be extended approximately 90 days, such that the new deadline shall be **January 18, 2021**;

3 ▪ The deadline to file a pretrial order, currently November 17, 2020, be extended
4 approximately 90 days, such that the new deadline shall be **February 15, 2021**, unless
5 dispositive motions have been filed and not decided and, in that case, the deadline shall be 30
6 days after decision on the dispositive motions or a further court order.
7

8 **Discovery Completed.** The Parties exchanged Initial Disclosures. Advanced
9 Lighting's initial, and supplemental, disclosures have produced numerous documents, along
10 with various video files. The parties have exchanged written discovery requests, including
11 requests for documents, interrogatories, and requests for admissions. Thereafter, the Parties
12 exchanged responses to the written discovery requests. A hearing was held on Plaintiff's
13 Motion to Compel on or about August 10, 2020. To date, Plaintiff has not obtained revised
14 responses to the discovery requests, which Defendant is working on. Plaintiff recently took and
15 completed the referenced deposition of Nick Domschott, an Advanced Lighting worker.
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18 Plaintiff Blandburg's counsel and Advanced Lighting's counsel have been in contact
19 regarding the suitability of extending discovery in this matter. Further, the parties continue to
20 disagree about the scope of the FRCP 30(b)(6) deposition notice, and Plaintiff continues to
21 await Defendants specific objections to the topics listed in the notice. The parties continue to
22 disagree about Defendant's request for an in-person deposition of Plaintiff and issues regarding
23 availability of the deponents within the current short time frame for completing discovery. An
24 extension of the remaining discovery deadlines is warranted for this matter to be fully litigated
25 on the merits and an extension is in the best interests of both the Parties and the Court
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Discovery that remains to be completed. The Parties currently seek to have the following depositions completed: (1) Advanced Lighting seeks to take Plaintiff Blandburg's deposition; and (2) Blandburg seeks to take the Rule 30(b)(6) deposition of Advanced Lighting (3) Blandburg seeks to take the depositions of "Ryan", "Cody" and "Jose" based on information provided during the deposition of Nick Domschott. Counsel have an ongoing dispute regarding production of these witnesses which may need court intervention.

Plaintiff continues to await Defendants revised responses to the written discovery requests as ordered by the Court at the August 10, 2020 hearing.

For the above-specified reasons, good cause exists for the extensions requested herein.

Dated: September 14, 2020.

Dated: September 14, 2020.

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

September 16, 2020

DATE